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Systems Engineering
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November 16, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-001

Subject: B757 Inspection of Wire Bundles in Wing AFT Fairing – Proposed Rule

Reference: A/ Rules Docket No. FAA-2004-19540
B/ Boeing Service Bulletins 757-28A0073 & 757-280074
C/ NPRM Docket No. 2004-NM-110-AD

Dear Sir or Madam:

In response to the ref. /A/ FAA's proposed rule, requiring the inspections of certain wire bundles in the left and right engine aft fairings for discrepancies, Continental Airlines has reviewed the ref. /C/ NPRM and related documents and the comments below are submitted for your consideration.

- The ref. /B/ bulletins have been accomplished on 80% of Continental Airline's B757-200/-300 airplanes.
- The accomplishment instructions, as stated in the ref. /B/ bulletins (including the operational tests) took approximately 32 man-hours, or 16 elapsed hours per airplane.
- The accomplishment instructions, as stated in the ref. /B/ bulletins have revealed the following discrepancies that have prevented the accomplishment of the modifications to the remained of the fleet:
 - No wire slack available in some engine fairings for the accomplishment of the subject modification.
 - Wiring configuration in some engine fairings is not in accordance with the accomplishment instructions and figures of the ref. /B/ bulletins. In certain production delivery airplanes the affected wire is located in the center of the pylon and not near the right side panel. Refer to figure 1.



- The wiring for the right engine fuel shutoff valve in certain airplanes is found to be touching the hydraulic tubing and there is no provisioning to maintain proper separation. Refer to figure 2.
- The above discrepancies have been reported to Boeing and in coordination with Continental Airline's Engineering Department the following rework instructions are currently under evaluation:
 - Regarding the tight wiring discrepancy there are two possible solutions; a) to splice additional wire length per Standard Wiring Practices Manual, not a preferred solution due to location of the wire in a high vibration, flammable and environmental affected area and b) identification of any excess wiring near the end of the wire run at the shutoff valve, that is approximately 7 feet inboard along the rear spar at IRSS 270. Refer to figure 3.
 - Regarding the relocation of the wiring to clear the hydraulic tubing, the installation of a back to back and tube to wire clamps in order to maintain the proper wiring separation. Refer to figure 4.

Continental recommends that the reference /B/ service bulletins to be revised with the permanent rework instructions for the above mentioned discrepancies prior to the ref. /C/ NPRM becoming a 14 CFR Part 39- Airworthiness Directive (AD). If the ref. /C/ NPRM becomes an AD listing in the section "One-Time Inspections/Investigative and Corrective Actions" the ref. /B/ bulletins original release then alternate means of compliances for this AD per 14 CFR 39.19 procedures and for each airplane that any of the above discrepancies is found will be required.

Thank you for the opportunity to comment on this subject, and please feel free to contact me if you have further questions on this subject.

Sincerely,

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Master Systems Engineer

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FIGURE 1



FIGURE 2

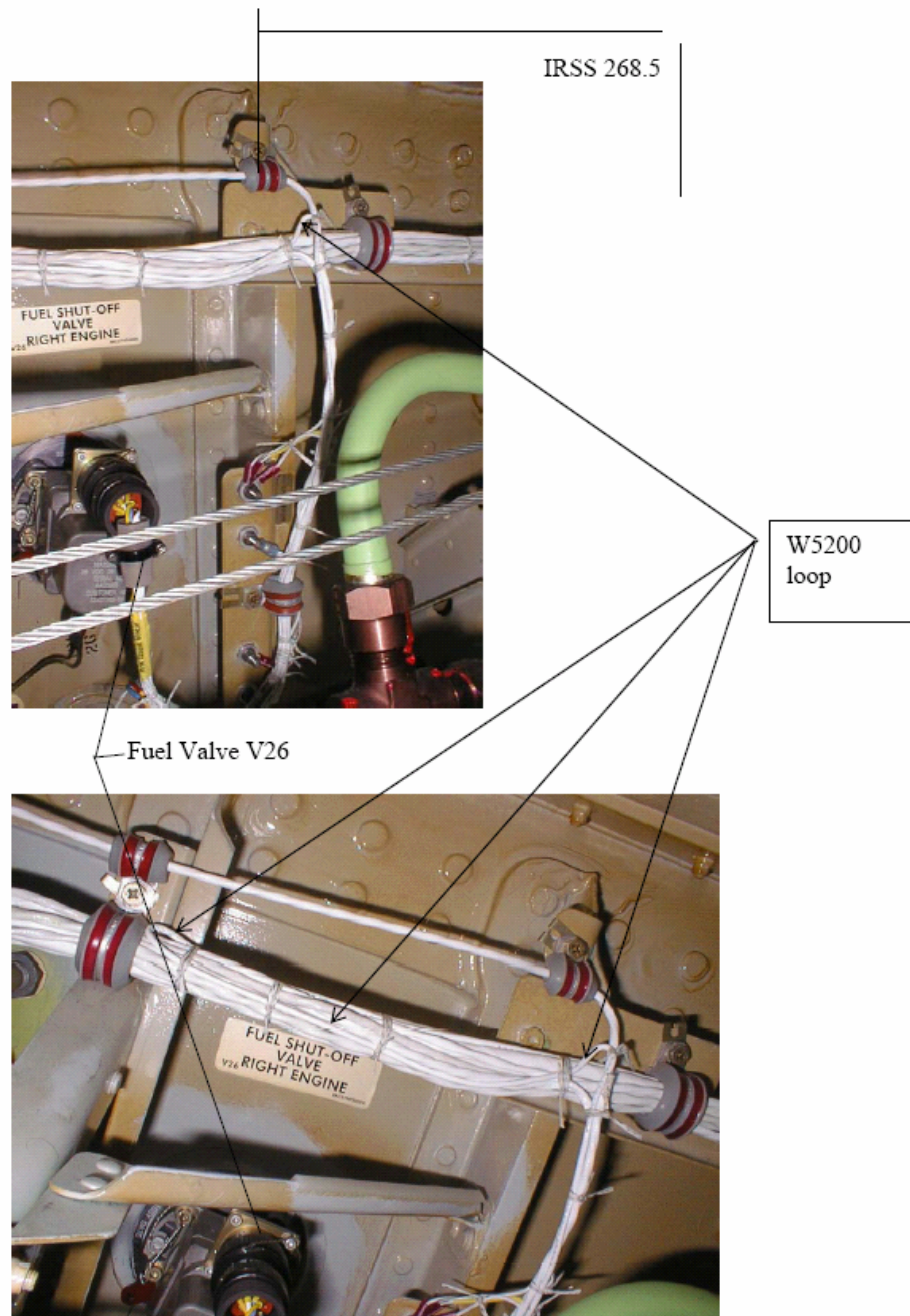


FIGURE 3

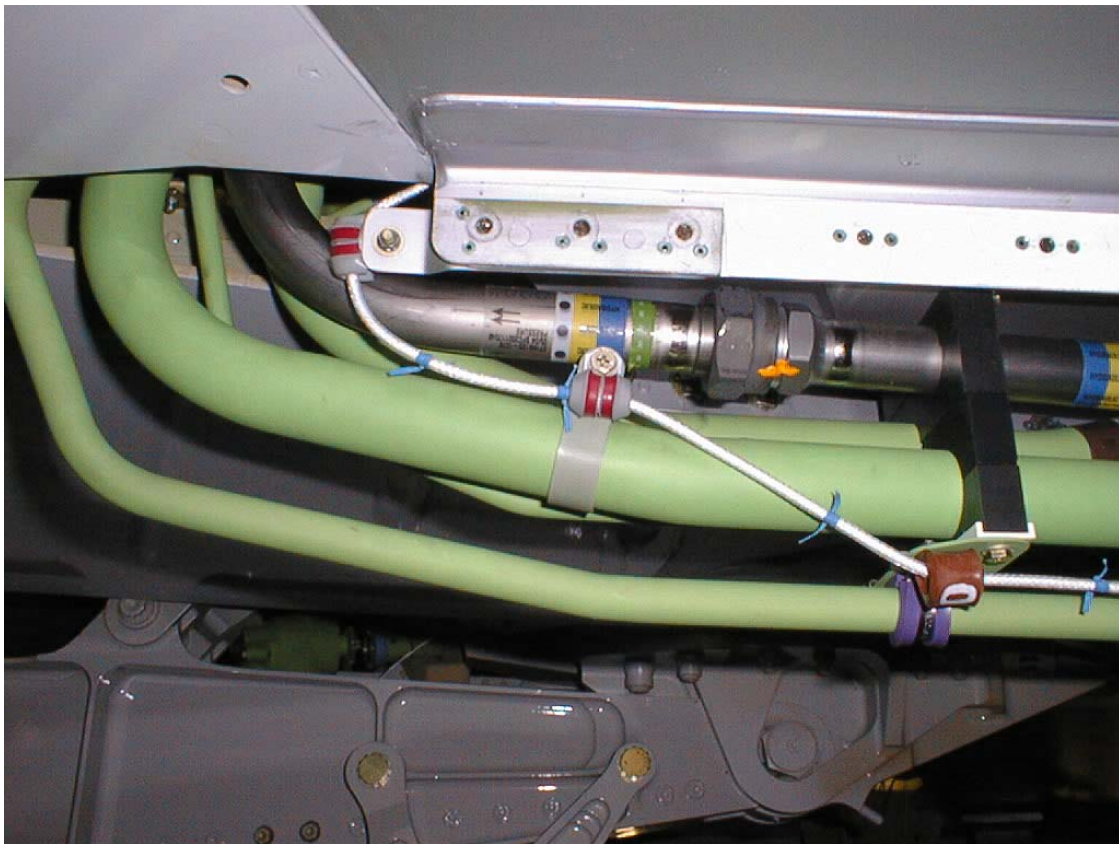


FIGURE 4